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Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, state as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I offer
4 this Declaration in the above-captioned matter in support of Uber’s Reply in Support of its Motion for
5 Entry of an Order to Show Cause Why 6 Plaintiffs Who Have Submitted Non-Bona-Fide Receipts
6 Should Not Be Dismissed with Prejudice.

7 2. Attached as **Exhibit 1** is a true and correct copy of a purported receipt submitted by Plaintiff
8 with MDL ID 1384 in the above-captioned matter.

9 3. Attached as **Exhibit 2** is a true and correct copy of a bona fide, itemized receipt from Uber’s
10 systems for a ride that occurred on January 1, 2022, and totaled \$9.58.

11 4. Attached as **Exhibit 3** is a true and correct copy of the confidential Defendant Fact Sheet Uber
12 provided to Plaintiff with MDL ID 1384 dated as of July 3, 2024. Uber served Plaintiff’s counsel with
13 this document on July 3, 2024.

14 5. Attached as **Exhibit 4** is a true and correct copy of Plaintiff’s Information for MDL ID 1384, as
15 shown on MDL Centrality as of September 17, 2025.

16 6. Attached as **Exhibit 5** is a true and correct copy of Plaintiff’s Information for MDL ID 2774, as
17 shown on MDL Centrality as of September 17, 2025.

18 7. Attached as **Exhibit 6** is a true and correct copy of the Ride Information Form uploaded by
19 Plaintiff with MDL ID 2774.

20 8. Attached as **Exhibit 7** is a true and correct copy of the confidential Defendant Fact Sheet Uber
21 provided to Plaintiff with MDL ID 2774 dated as of January 31, 2025. Uber served Plaintiff’s counsel
22 with this document on February 5, 2025.

23 9. Attached as **Exhibit 8** is a true and correct copy of the verified Amended Plaintiff Fact Sheet
24 submitted by Plaintiff with MDL ID 1384.
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10. Attached as **Exhibit 9** is a true and correct copy of the Amended Plaintiff Fact Sheet submitted by Plaintiff with MDL ID 2774.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: September 18, 2025

Respectfully submitted,

By: 

Christopher V. Cotton (admitted *Pro Hac Vice*)

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